

UNITED STATES DISTRICT COURT

CRIMINAL NO: 04-10045-DPW

UNITED STATES OF AMERICA

v.

LOUIS RAMERIZ

MOTION FOR FUNDS FOR EXPERT SERVICES

The undersigned counsel for the defendant, Louis Rameriz moves the Court for funds for expert services for a forensic psychological examination to determine criminal responsibility at the time of the alleged offense.

As reasons, counsel states that he has received a report from Dr. Paul Spiers, clinical and neuro-psychologist that the defendant is currently incompetent to stand trial. Examination by a forensic expert for the government is currently proceeding on the issue of competency.

The defendant has not been examined as to criminal responsibility at the time of the alleged offense. The undersigned seeks funds to retain the services of Dr. Scott Bressler, Ph.D., a board certified forensic psychologist, in private practice. Dr. Bressler additionally serves as a Commonwealth expert, in his role as Assistant Director of Forensic Services at the Bridgewater State Hospital. Dr. Bressler bills his time in private practice at \$180.00 per hour. Counsel requests approval of funding in the amount of \$1,800.00, including time anticipated for travel, examination, and preparation of a report of his findings and consultation with counsel. Counsel does not include an anticipated budget in connection with potential testimony at trial, if necessary as such is currently not

ripe for submission. Counsel will make further application in advance of scheduling Dr. Bressler's testimony if his findings indicate the likelihood trial testimony will be necessary.

WHEREFORE the undersigned moves the Court for \$1,800.00 (one thousand eight hundred dollars), funding for expert services for Dr. Scott Bressler, Forensic Psychologist, to conduct an examination as to criminal responsibility at the time of the alleged offense, and to prepare a report of his findings and consult with counsel as necessary.

Respectfully submitted,

January 5, 2005

/s/ Benjamin D. Entine, Esq.
77 Franklin Street
Third Floor
Boston, MA 02110
Tel: 617-357-0770
BBO# 558553